



# EVERGREEN SOLUTIONS

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OFFICE OF GENERAL  
COUNSEL

June 16, 2009

Mr. Jeff S. Jordan  
Supervisory Attorney  
Complaints Examination & Legal Administration  
Federal Election Commission  
999 E Street, N.W.  
Washington, D.C. 20463

RE: Response to MUR 6102

Dear Mr. Jordan:

In response to the complaint filed by Shane M. Saunders, a legislative assistant to my opponent Rep. John Sullivan from 2002 through 2006, and as CEO and sole shareholder of EverGreen Solutions, Inc., I hereby certify as follows:

**Response to alleged Violation #1.** No complaint against EverGreen Solutions, Inc. is alleged in alleged violation #1. Notwithstanding the foregoing, as CEO and sole shareholder of EverGreen Solutions, Inc., I am providing the following information:

All funds loaned to the Oliver Committee were loaned from "personal funds" as defined in 11 CFR 100.33. These personal funds came from distributions which were made to me personally from the following sources:

- 1) The IRA Accounts listed on Schedule II of the United States House of Representatives Financial Disclosure Statement;
- 2) Distributions made to me personally as sole shareholder of EverGreen Solutions, Inc., in accordance with the EverGreen Solutions, Inc. bylaws (EverGreen Solutions, Inc. is listed as an asset on Schedule II of the United States House of Representatives Financial Disclosure Statement); and
- 3) Income derived from employment (salary) with EverGreen Solutions, Inc. (which is disclosed on Schedule I of the United States House of Representatives Financial Disclosure Statement).

All of these loans were detailed as required by law in Schedule C to FEC Form 3. Newspaper articles alleging that the funds came from loans from EverGreen Solutions, which articles were corrected multiple times (including a correction which was not included in Mr. Saunders' complaint), are not evidence of violations of FEC Rules or Regulations and the complaint clearly fails to provide any evidence of any such violations.



All funds from the sale of the assets of AptBudget were paid to AptBudget. AptBudget owed debt to EverGreen Solutions, which AptBudget paid to EverGreen Solutions at the time of the sale. The amount owed to EverGreen by AptBudget was greater than the amount of the proceeds from the sale of AptBudget's assets. The value of AptBudget's assets were included in the value of EverGreen Solutions, Inc. as reported on Schedule II of the United States House of Representatives Financial Disclosure Statement by virtue of the receivable owed by AptBudget to EverGreen Solutions, Inc., which receivable was greater than the amount received by AptBudget when AptBudget sold its assets.

**Response to alleged Violation #2.** No complaint against EverGreen Solutions, Inc. is alleged in alleged violation #2. EverGreen Solutions, Inc. was not involved in the preparation of any reports to the FEC.

**Conclusion.** Given the fact that Mr. Saunders has not made any complaints against EverGreen Solutions, Inc. in either alleged Violation #1 or alleged Violation #2, and given the fact that no evidence of any violation of FEC Rules or Regulations has been provided by Mr. Saunders, no action should be taken by the FEC against EverGreen Solutions, Inc.

I hereby swear upon penalty of perjury that the above and foregoing responses and the information set forth in this response is true and correct to the best of my knowledge and belief.

Sincerely Yours,

Georgianna W. Oliver, CEO and Sole  
Shareholder of EverGreen Solutions, Inc.

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